



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
WATER

MEMORANDUM

SUBJECT: Source Water Assessment and Protection

FROM: G. Tracy Mehan III
Assistant Administrator

A handwritten signature in black ink, reading "G. Tracy Mehan III", is written over the typed name and title.

TO: Regional Administrators

The Congressional mandate to establish a national Source Water Assessment and Protection Program as part of the Safe Drinking Water Act (SDWA) Amendments of 1996 marked a milestone in the protection of America's drinking water resources. Public health protection through source water protection is one of my top priorities in the coming years, and is a core component of the watershed approach. There are many activities that together make up this multifaceted program. However, the foundation of these efforts is the development of high quality and timely source water assessments. I request your assistance in ensuring these assessments are completed in the coming months consistent with the statutory deadline.

Source Water Assessments

Section 1453 of the Safe Drinking Water Act, directed states to assess the source water susceptibility of each public water system to contamination, and provide the public a summary of its findings. The deadline is fast approaching by which States must complete their source water assessments. This year all 160,000 Public Water Systems (PWS's) must have:

1. Delineated and mapped their sources of drinking water;
2. Inventoried the potential contamination activities and contaminants involved;
3. Assessed the susceptibility of the drinking water resources to those contaminants; and,
4. Made the assessment information public.

The PWSs are expected to then develop (a) management measures to protect their sources of drinking water, and, (b) contingency plans for man-made or catastrophic events.

The Source Water Assessment and Protection Program builds on established SDWA programs like the Underground Injection Control (UIC) program, the Wellhead Protection Program (WHPP) and the Sole Source Aquifer Program (SSA). Other Federal statutes that address water pollution at its source [e.g., the Clean Water Act (CWA), the Resource Conservation and Recovery

Act (RCRA), and the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)] also promote the goal of protecting drinking water resources.

There has been enormous progress in the planning, preparation and development of these assessments. However, as the deadline approaches, much work remains to be done. With such a large workload, I understand that every assessment may not be completed by the deadline. We have also made clear, that given the long term importance of these assessments, we don't want to sacrifice quality merely to have assessments completed a few months earlier. Nonetheless, we should work with states to complete the overwhelming majority of these assessments in the next few months. The attached progress report indicates the status of this effort in each region and state. Please review this data. I ask for your personal involvement in encouraging the States to complete this task with continued attention to the accuracy and thoroughness of each assessment.

Source Water Protection

The purpose of sound assessments is to inform and motivate local source water protection activities. Source protection is the critical initial component in the SDWA multiple barrier protective scheme. Because of the wide diversity of potential contaminants and risks, Congress intended that communities have the flexibility to tailor their contamination prevention actions to local circumstances. Our role in source protection is to help states and localities take advantage of the wealth of information in the assessments and translate it into actions that will reduce current risks or avoid future threats to drinking water.

EPA actions should initially include educating citizens and communities to the public health and financial benefits of source protection. Beyond that, Office of Water and Regional staff should be active in providing tools, guidance, models, technical assistance and useful data. Finally, EPA should work in concert with States, local communities, associations and citizen groups in implementing risk management protection actions.

In the Office of Water, we are working to build partnerships with state and local level organizations to protect the nation's sources of drinking water. These organizations include the Environmental Council of the States, the Association of State Drinking Water Administrators, the Ground Water Protection Council, the Association of State and Interstate Water Pollution Control Administrators, the National Rural Water Association, the American Water Works Association, the Association of Metropolitan Water Authorities, the Ground Water Foundation, the Technical Assistance Centers, the Environmental Finance Center Network, the environmental and business communities and others. I encourage you to make a comparable effort at the regional level. It will take a unified effort by many participants to achieve our objective. Only through such actions can we reap the significant benefits that source protection can make to drinking water safety.

The Role of Clean Water Act Programs

I appreciate that programs under the Clean Water Act (CWA) are some of our most important tools in protecting sources of drinking water from contamination. Therefore, I am committed to promoting full utilization of those programs to help protect drinking water sources wherever possible. I have directed my staff to continue the CWA/SDWA integration actions that have been a priority for the past two years. The operating principle of these policy efforts is that, while public water systems are legally accountable for the delivery of safe drinking water to their consumers, no water system should have to provide more treatment than that which is necessary to address naturally occurring pollutant concentrations e.g., minerals leaching from rock formations, wildlife contamination unrelated to anthropogenic activities. Specific actions include making it a priority in our Water Quality Standards program to ensure that all waters that are sources of drinking water are properly designated for drinking water use and have appropriate standards. We will also work to have prompt development of water quality criteria for critical drinking water contaminants of concern. Additionally, consideration of drinking water sources will be an important factor in development of our monitoring strategy and in prevention program efforts, e.g., nonpoint source program. We plan to promote and institutionalize this cross program support by the introduction of specific integration and accountability measures in the upcoming Agency Strategic Plan. Please support these efforts in your Regions and with your States.

National Source Water Protection Conference

As a means to share ideas and coordinate our efforts, I invite you, your management team and staff, and your States to participate in the National Source Water Protection Conference being held in Washington, D.C. on June 2-4, 2003. This conference will address a wide range of source water assessment and protection issues, including data management tools and financial opportunities from the local, state and national perspectives. There will be speakers from California, Colorado, Connecticut, Idaho, Maine, Minnesota, Nevada, North Carolina, Ohio, Pennsylvania, Vermont, Washington, state and local associations, and environmental and business associations. We see it as a good opportunity to celebrate the success of the assessment work of recent years and promote a smooth transition to the source protection phase of the program.

Conclusion

The effort devoted to these drinking water protection activities will significantly advance our public health objectives. I also believe they will have additional benefits for the balance of our water programs. I appreciate your efforts and support in carrying out these critical undertakings.

Attachments

cc: OW Office Directors/Deputy Office Directors
Regional Water Management Division Directors

Status of Source Water Assessment Program by Region

	System Category	Total Systems by Category	Percentage of Assessments Completed
National	ALL	159,747	17%
	CWS	52,437	24%
	NTNCWS	18,379	20%
	TNCWS	88,931	12%
Region 1	CWS	2,699	41%
	NTNCWS	2,024	32%
	TNCWS	6,018	25%
Region 2	CWS	3,915	1%
	NTNCWS	1,705	0%
	TNCWS	9,245	0%
Region 3	CWS	4,792	41%
	NTNCWS	2,673	43%
	TNCWS	11,845	32%
Region 4	CWS	9,557	17%
	NTNCWS	2,387	3%
	TNCWS	10,176	1%
Region 5	CWS	7,554	18%
	NTNCWS	5,447	3%
	TNCWS	34,327	2%
Region 6	CWS	8,161	26%
	NTNCWS	1,386	19%
	TNCWS	2,771	25%
Region 7	CWS	4,129	30%
	NTNCWS	642	67%
	TNCWS	2,370	23%
Region 8	CWS	3,084	21%
	NTNCWS	620	5%
	TNCWS	3,330	5%
Region 9	CWS	4,201	35%
	NTNCWS	395	53%
	TNCWS	3,803	39%
Region 10	CWS	4,345	18%
	NTNCWS	1,100	22%
	TNCWS	5,046	33%

Status of Source Water Assessment Program by State

	State	Total Community Water Systems	Percentage of Assessments Completed
Region 1	Connecticut	578	0%
	Maine	392	0%
	Massachusetts	519	27%
	New Hampshire	684	88%
	Rhode Island	84	0%
	Vermont	442	80%
	Total	2,699	41%
Region 2	New Jersey	603	0%
	New York	2,859	0%
	Puerto Rico	453	5%
	Total	3,915	1%
Region 3	Delaware	246	20%
	DC	2	0%
	Maryland	499	17%
	Pennsylvania	2,169	35%
	Virginia	1,320	80%
	West Virginia	556	2%
	Total	4,792	41%
Region 4	Alabama	581	37%
	Florida	1,945	0%
	Georgia	1,664	32%
	Kentucky	439	10%
	Mississippi	1,187	67%
	North Carolina	2,401	2%
	South Carolina	672	0%
	Tennessee	668	0%
	Total	9,557	17%
Region 5	Illinois	1,798	62%
	Indiana	865	0%
	Michigan	1,470	0%
	Minnesota	957	4%
	Ohio	1,354	17%
	Wisconsin	1,110	0%
	Total	7,554	18%

Status of Source Water Assessment Program by State

	State	Total Community Water Systems	Percentage of Assessments Completed
Region 6	Arkansas	728	11%
	Louisiana	1,146	76%
	New Mexico	615	3%
	Oklahoma	1,159	100%
	Texas	4,513	0%
	Total	8,161	26%
Region 7	Iowa	1,144	75%
	Kansas	918	7%
	Missouri	1,453	0%
	Nebraska	614	48%
	Total	4,129	30%
Region 8	Colorado	907	0%
	Montana	663	15%
	North Dakota	318	63%
	South Dakota	469	0%
	Utah	455	72%
	Wyoming	272	0%
	Total	3,084	21%
Region 9	Arizona	796	12%
	California	3,031	45%
	Hawaii	116	0%
	Nevada	258	0%
	Total	4,201	35%
Region 10	Alaska	433	21%
	Idaho	742	76%
	Oregon	889	16%
	Washington	2,281	0%
	Total	4,345	18%